

# **EXHIBIT 15**

**UNITED STATES COURT  
NORTHERN DISTRICT OF CALIFORNIA**

In re ) Bankruptcy Case  
 ) No. 19-30088 (DM)  
PG&E CORPORATION and ) Chapter 11  
PACIFIC GAS AND ELECTRIC ) (Lead Case) (Jointly Administered)  
COMPANY, )  
 )  
Debtors. ) **DECLARATION OF  
MIKAL WATTS ATTACHED TO  
JOINT REPORT REGARDING  
THE STATUS OF THE VOTE**

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors  
\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)

Date: April 30, 2020  
Time: 2:00 p.m. (Pacific Time)  
Judge: Hon. James Donato  
Place: Telephonic Only: (877) 402-9753,  
access code 5266369

[Re Dkt. Nos. 308, 311, 342]

**DECLARATION OF MIKAL WATTS**

Mikal Watts declares the following pursuant to 28 U.S.C. § 1746:

1. I am an attorney at the law firm of WATTS GUERRA LLP.
2. My firm represents more than 16,000 individuals with unique claims arising from wildfires alleged to have begun by PG&E equipment, who timely filed a Notice of Claim prior to the amended Bar Date ordered by the Bankruptcy Court.
3. Pursuant to the Restructuring Support Agreement (Doc. #5038-1; Case: 19-30088, Entered 12/09/19, p. 6, ¶2(g)), my firm has used “reasonable efforts to advise and recommend to its existing and future clients’ (who hold Fire Victim Claims) to support and vote to accept the Amended Plan.”
4. As authorized by both the Restructure Support Agreement (ECF # 5038-1, p. 4; ¶2(a)(ii)) (“the Debtors shall... seek approval by the Bankruptcy Court of procedures to allow distribution of solicitation materials and casting of ballots for holders of Fire Victim Claims by

1 digital means”), and by Order of the Bankruptcy Court Establishing and Approving Plan  
2 Solicitation and Voting Procedures (ECF #6340, p. 12, ¶13(a)) (Each firm selecting the Master  
3 Ballot Solicitation Method... shall ...provide the Disclosure Statement, either in hard copy of  
4 electronic format, to its Fire Victim Clients”), my firm has been soliciting and collecting votes both  
5 electronically and by mail.  
6

7 5. A true and correct copy of the text ballot format with which my firm sent its clients  
8 the required court-ordered documents, including the Disclosure Statement, is attached hereto as  
9 Exhibit “A.” The client recipient of the text may first click on a line entitled “Review Court Ordered  
10 Documents,” and cause each of the Court-ordered documents to be revealed in a PDF format for  
11 review. Next, the client recipient of the text may then click on either “ACCEPT (I.E., VOTE IN  
12 FAVOR) the Plan” or “REJECT (I.E., VOTE AGAINST) the Plan.”  
13

14 6. These text votes are electronically delivered to our firm, and tabulated on a daily  
15 basis.  
16

17 7. As of 12:00 p.m. PDT on Monday, April 27, 2020, at 2:30 p.m. PDT, 13,329 of my  
18 clients have voted to “ACCEPT” the Amended Plan.  
19

20 8. As of 12:00 p.m. PDT on Monday, April 27, 2020, at 2:30 p.m. PDT, 148 of my  
21 clients have voted to “REJECT” the Amended Plan.  
22

23 9. Concerning Tosdal’s filing with this Court (Doc. #342, Case 3:19-cv-05257-JD,  
24 filed 04/27/20), the undersigned wishes to inform this Court as to the method the firm is using to  
25 solicit, collect and report votes cast by its respective clients.  
26

27 10. Regarding Exhibit 1 of ECF 342 filed by Tosdal on April 27, 2020, my law firm has  
28 not told its clients that “it will vote ‘yes’ for them but to call the firm if any client disagrees with a  
‘yes’ vote.”

1           11.     Regarding Exhibit 2 of ECF 342 filed by Tosdal on April 27, 2020, my law firm has  
2 not “solicit[ed] a ‘yes’ vote by text but require[ed] a different method to register a ‘no’ vote.”

3           12.     Regarding Exhibit 3 of ECF 342 filed by Tosdal on April 27, 2020, my law firm has  
4 not “provid[ed] a client with an easy click to vote ‘yes’ but requiring a client type in ‘no.’”

5           13.     Regarding Exhibit 4 of ECF 342 filed by Tosdal on April 27, 2020, my law firm has  
6 not “request[ed] a client’s agreement for the firm to vote for the client but not recognizing a ‘no’  
7 answer to the request.” We have not and will not cast a ballot for a client who has failed to vote  
8 either “ACCEPT” or “REJECT.”

9           14.     Regarding Exhibit 5 of ECF 342 filed by Tosdal on April 27, 2020, my law firm has  
10 not sought to have its clients vote by email without giving a client the ability to cast either an  
11 “ACCEPT” or a “REJECT” vote.  
12

13           15.     I affirm that the facts set forth in this declaration are true and correct.

14           Dated April 28, 2020

15                     Respectfully submitted,

16  
17                     /s/ Mikal C. Watts

18                     Mikal C. Watts

19                     WATTS GUERRA LLP

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27                     Attorney for Numerous Wild Fire Claimants  
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